

EXHIBIT C

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

Orbital Technologies Corporation,

Case No. 08-C-220-C

Plaintiff,

v.

PFO Lighting, Inc.

Defendant.

**DEFENDANT'S SECOND SET OF REQUESTS FOR THE
PRODUCTION OF DOCUMENTS AND THINGS**

Pursuant to Fed. R. Civ. P. 26 and 34, defendant PFO Lighting, Inc. ("PFO") requests that plaintiff Orbital Technologies Corporation ("Orbitec") provide a written response and produce the following documents within thirty (30) days at the offices of Foley & Lardner LLP, 150 East Gilman Street, Madison, Wisconsin 53703 or at such other place and time as counsel for the parties may agree.

DEFINITIONS & INSTRUCTIONS

1. Defendant incorporates by references all definitions and instructions stated in PFO's First Set of Requests for the Production of Documents and Things.
2. The terms "plant LED lighting technology" and "plant LED lighting product" mean LED lighting systems designed to promote plant growth.
3. The term "Apollo LED Aquarium Lighting System" means the system as described at <http://www.planet-llc.com/pages/sunbow/pages/apollo.htm>.

REQUESTS FOR PRODUCTION OF DOCUMENTS

REQUEST FOR PRODUCTION NO. 101:

All documents referring or relating to any relationship, corporate or otherwise, that exists between Orbitec and Planet LLC.

REQUEST FOR PRODUCTION NO. 102:

All documents referring or relating to the corporate organization or management of Planet LLC or any of its subsidiaries or related companies, including but not limited to corporate organization charts, department organization charts, and lists of management duties and responsibilities.

REQUEST FOR PRODUCTION NO. 103:

All documents referring or relating to the ownership of Planet LLC or any of its subsidiaries or related companies, including the percentage and total dollar value of said ownership.

REQUEST FOR PRODUCTION NO. 104:

Documents and things sufficient to identify all of the current officers and directors of Planet LLC.

REQUEST FOR PRODUCTION NO. 105:

All documents referring or relating to Orbitec's development, prior to December 15, 2003, of plant LED lighting technology.

REQUEST FOR PRODUCTION NO. 106:

All documents referring or relating to the sale or offer to sell by Orbitec, prior to December 15, 2003, of plant LED lighting technology.

REQUEST FOR PRODUCTION NO. 107:

All documents referring or relating to any public use, prior to December 15, 2003, of plant LED lighting technology developed by Orbitec.

REQUEST FOR PRODUCTION NO. 108:

All documents referring or relating to any work performed by the Plant Research Unit of Orbitec prior to December 15, 2003.

REQUEST FOR PRODUCTION NO. 109:

All documents referring or relating to Planet LLC's development, prior to December 15, 2003, of plant LED lighting technology.

REQUEST FOR PRODUCTION NO. 110:

All documents referring or relating to the sale or offer to sell by Planet LLC, prior to December 15, 2003, of plant LED lighting technology.

REQUEST FOR PRODUCTION NO. 111:

All documents referring or relating to any public use, prior to December 15, 2003, of plant LED lighting technology developed by Planet LLC.

REQUEST FOR PRODUCTION NO. 112:

All documents referring or relating to the Apollo LED Aquarium Lighting System.

REQUEST FOR PRODUCTION NO. 113:

All documents referring or relating to the development of the Apollo LED Aquarium Lighting System.

REQUEST FOR PRODUCTION NO. 114:

All documents referring or relating to the licensing or granting of any rights in the '018 patent to Planet LLC.

REQUEST FOR PRODUCTION NO. 115:

All documents referring or relating to any attempts by Orbitec or Planet LLC to license or grant any rights in the '018 patent to any entity besides PFO.

REQUEST FOR PRODUCTION NO. 116:

All documents referring or relating to any negotiations relating to potential or actual licensing or granting of any rights in the '018 patent to any entity besides PFO.

Dated this 24th day of October 2008.

/s/ Justin E. Gray
Allen A. Arntsen (SBN 1015038)
Justin E. Gray (SBN 1061486)
FOLEY & LARDNER LLP
150 E. Gilman Street
P.O. Box 1497
Madison, WI 53701-1497
(608) 258-4293
(608) 258-4258 (fax)

Attorneys for Defendant